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9 Attorneys for Defendants County of Riverside, Detective Rick Dominguez, Deputy Worden,  
10 Deputy Bazanos, and Deputy Davis

11 UNITED STATES DISTRICT COURT  
12 CENTRAL DISTRICT OF CALIFORNIA  
13

14 RAMIRO GONZALEZ, SR.,	}	CASE NO. CV 13-01785 JGB (SPx)
15 LAURA GONZALEZ,		PROTECTIVE ORDER
15 RAMIRO GONZALEZ, JR.,		
16 Plaintiffs,	}	[NOTE CHANGES MADE BY COURT]
17 vs.		
18 COUNTY OF RIVERSIDE, DETECTIVE		
19 RICK DOMINGUEZ, DEPUTY WORDEN,	}	
19 DEPUTY BAZANOS, DEPUTY DAVIS,		
20 individually and as a peace officer, DOES 1-		
20 10, Inclusive,	}	
21 Defendants.		

22  
23 In order to protect the confidentiality of documents and information while  
24 still allowing necessary discovery, the Court orders as follows:

25 1. Defendants may designate specific documents or specific types of  
26 information as confidential. Any document and information so designated shall be  
27 subject to the terms of this Protective Order. The documents so designated shall be  
28 limited to documents which are covered by California Evidence Code § 1043-1047

1 and/or California Penal Code § 832.7.

2 2. Absent a further stipulation or court order, any documents and information  
3 designated as confidential shall not be conveyed, transferred, published, distributed,  
4 copied, duplicated or disseminated except as follows:

5 (a) To the counsel for Plaintiffs and their staff.

6 (b) To consultants for Plaintiffs concerning the issues raised by this lawsuit,  
7 and their staff.

8 3. Prior to the dissemination of any such documents or information pursuant  
9 to this Protective Order, counsel for Plaintiffs shall inform such person of the terms  
10 and conditions of this Protective Order and secure such person's agreement in  
11 writing to be bound by it.

12 4. All parties subject to this Protective Order are precluded from using any  
13 such documents or information except for the purposes of litigating the present  
14 lawsuit.

15 5. At the conclusion of this lawsuit, any documents provided pursuant to this  
16 Protective Order shall be either returned to counsel for Defendants, or destroyed and  
17 proof of such destruction shall be provided to counsel for Defendants.

18 6. All parties subject to this Protective Order shall take reasonable  
19 precautions to prevent the unauthorized or inadvertent disclosure of any of the  
20 documents and information designated as confidential.

21 7. The parties may stipulate that any document or item of information which  
22 was initially designated as confidential and subject to this Protective Order is not  
23 confidential and not subject to this Protective Order.

24 8. If a stipulation cannot be reached, Plaintiffs may apply to the Court in  
25 compliance with the requirements in Local Civil Rule 37 for an order that a  
26 document or item of information which was designated as confidential and subject  
27 to this Protective Order is not confidential and not subject to this Protective Order.  
28 Any such application to the Court must be filed with an application under Local

1 Civil Rule 79-5.1 to file under seal any document or item of information designated  
2 as confidential, with the contents not disclosed publicly, unless and until the Court  
3 rules that the document or item of information is not subject to the Protective Order.

4 9. If any documents or items of information designated as confidential are  
5 used at deposition, the relevant portions of any such deposition shall be subject to  
6 the terms of this Protective order unless there has been a prior stipulation or order  
7 designating the document as non-confidential.

8 10. Any document that has been designated as confidential pursuant to this  
9 Protective Order shall be filed with the Court with an application under Local Civil  
10 Rule 79-5.1 to file it under seal, unless there has been a prior stipulation or order  
11 designating the document as non-confidential.

12 11. If Defendants believe that the provisions of this Protective Order have  
13 been violated, Defendants may apply to the Court for an order seeking monetary  
14 sanctions, evidence sanctions, or other appropriate relief.

15 12. This Protective Order shall survive the final termination of this action, to  
16 the extent that the documents and information disclosed remain confidential and do  
17 not become known to the public, and the Court shall retain jurisdiction to assess  
18 monetary sanctions or other relief and to resolve any dispute concerning the use of  
19 the documents and information disclosed pursuant to this Protective Order.

20 DATED: August 14, 2014

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23 United States Magistrate Judge  
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